

Anthony L. Hall, Esq.
Nevada Bar No. 5977
ahall@hollandhart.com
Peter D. Navarro, Esq.
Nevada Bar No. 10168
pdnavarro@hollandhart.com
HOLLAND & HART LLP
9555 Hillwood Drive, 2nd Floor
Las Vegas, Nevada 89134
(702) 669-4600
(702) 669-4650 – fax
Attorneys for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CAMERON E. OLIVER, individually and on
behalf of others similarly situated,

Plaintiff,

v.

BELL TRANS, a Nevada Corporation, and
BRENT J. BELL,

Defendants.

CASE NO.: 2:16-cv-00305-JAD-PAL

**JOINT NOTICE OF SETTLEMENT
AND
STIPULATION AND ORDER TO STAY
ALL PROCEEDINGS
(EIGHTH REQUEST)**

(Fourth Request Regarding Submission of
Settlement Documents)

Defendants Bell Trans and Brent J. Bell (collectively, “Bell Trans” or “Defendants”), and Plaintiff Cameron E. Oliver, (“Plaintiff”), through their counsel of record, submit the below stipulation to extend the stay of all proceedings in the above captioned matter. On August 31, 2017, after being notified that the parties had agreed to settle, on a collective and class-wide basis, all disputed and claims related to this litigation and related litigation (Case No. 2:15-cv-01066-MMD-PAL, *Willie Thurmond v. Presidential Limousine*), the Court granted the parties’ stipulation to stay this matter until July 27, 2017 in order to allow the parties time to set forth in greater detail the terms of the parties’ settlement, as well as to allow Plaintiff’s counsel time to file a motion seeking the Court’s approval of the settlement terms. ECF No. 49.

The parties have been working to that end, and since the last stipulation Defendants have compiled and, concurrently with the filing of this stipulation, are providing Plaintiffs with

1 extensive data regarding the putative settlement class, including wage and hour records for
2 approximately 1900 individuals who may potentially be included in the settlement of this matter
3 and/or the related litigation. Upon receipt of this information, Plaintiffs will require time to
4 meaningfully analyze the data and conduct due diligence before they can sign off on the terms of
5 settlement. Accordingly, the parties hereby request and respectfully stipulate as follows:

6 The parties agree to stay all proceedings in the above captioned matter for a period of 47
7 additional days beyond the current stay, ending on September 27, 2017, to allow for the
8 preparation and finalization of appropriate settlement documents. As set forth herein, this is the
9 parties' fourth request to stay this matter for the purpose of memorializing their negotiations into
10 settlement documents. If this stipulation is granted the current stay shall be extended until
11 Monday, November 13, 2017.

12 The forgoing request for stay is made in good faith not for the purpose of delay.

13 DATED this 27th day of June, 2017.

14
15 BY: /s/ Leon Greenberg, Esq.
16 LEON GREENBERG, ESQ.
17 NV Bar No. 8094
18 leongreenberg@overtimelaw.com
19 DANA SNIEGOCKI, ESQ.
20 NV Bar No. 11715
21 dana@overtimelaw.com
22 LEON GREENBERG PROFESSIONAL
23 CORPORATION
24 2965 South Jones Blvd – Suite E3
25 Las Vegas, Nevada 89146


26 *Attorneys for Plaintiffs*

BY: /s/ Peter D. Navarro, Esq.
ANTHONY L. HALL, ESQ.
Nevada Bar No. 5977
ahall@hollandhart.com
PETER D. NAVARRO, ESQ.
Nevada Bar No. 10168
pdnavarro@hollandhart.com
HOLLAND & HART LLP
5441 Kietzke Lane, Second Floor
Reno, Nevada 89511

Attorneys for Defendants

ORDER

IT IS SO ORDERED.

27
28


U.S. District Judge Jennifer Dorsey
September 28, 2017